

UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of:

Information associated with the following Facebook user ID  
100001473429885 and stored at premises owned,  
maintained, controlled, or operated by Facebook Inc., a  
company headquartered in Menlo Park, California

Case No.

19-811 M (NJ)

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B.

The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: 18 U.S.C. § 1591(a)

The application is based on these facts: See attached affidavit.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Melissa A. Fus  
Applicant's signature

Special Agent Melissa A. Fus, WI DOJ-DCI  
Printed Name and Title

Sworn to before me and signed in my presence:

Date: February 8, 2019

Nancy Joseph  
Judge's signature

City and State: Milwaukee, Wisconsin

Nancy Joseph, U.S. Magistrate Judge  
Printed Name and Title

## **AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Melissa A. Fus, being first duly sworn, hereby depose and state as follows:

### **I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Wisconsin Department of Justice-Division of Criminal Investigation (DOJ-DCI) and have been in law enforcement since 2003.

2. I am currently assigned to the Human Trafficking Bureau for the Wisconsin Department of Justice and also the Federal Bureau of Investigation Wisconsin Human Trafficking Task Force ("WHTTF"). My duties as a Special Agent with the WI DOJ-DCI include human trafficking investigations involving minors and adults. I have gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state, and federal law enforcement agencies.

3. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law enforcement officers, who have provided information to me during the course of their official duties and whom I consider to be truthful and reliable. Some of the information was provided in response to administrative subpoenas and search warrants, and I believe that this information is also reliable.

### **II. PURPOSE OF AFFIDAVIT**

4. I make this affidavit in support of an application for a search warrant for information associated with a Facebook user ID and Instagram account that is stored at premises owned, maintained, controlled, or operated by Facebook, Inc. ("Facebook"), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an

application for a search warrant under 18 U.S.C. § 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscribers or customers associated with the specified Facebook user ID.

5. More specifically, I seek authorization to search Facebook's information associated with the following individual, who I have identified by name as well as by Facebook account name:

NAME	FACEBOOK ACOUNT (UID)	SCREEN NAME
Adult Victim (AV-1)	100001473429885  <a href="https://facebook.com/abbey.deavers">https://facebook.com/abbey.deavers</a>	Abby Rose

6. Based on my training and experience and the facts as set forth in this affidavit, I submit there is probable cause to believe that Darren D. Hatchett has committed, is committing, and will continue committing violations of Title 18, United States Code, Section 1591(a). There is also probable cause to believe that the location information described in Attachment B will constitute evidence of these criminal violations of 18 U.S.C. § 1591(a), and will assist case agents in determining/identifying Darren Hatchett's other victims, routines, locations of prostitution activities, and co-conspirators.

7. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure and Title 18, United States Code, Section 2703(c)(1)(A) for information about the location of cellular telephone assigned call number 414-406-7364 with ESN 089595264803672336 ("**Target Phone**"), whose service provider is Sprint Spectrum L.P., a wireless telephone service provider headquartered in Overland Park, Kansas. The **Target**

**Phone** is described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B.

8. Based on my training and experience and the facts as set forth in this affidavit, I submit there is probable cause to believe that Darren D. Hatchett has committed, is committing, and will continue committing violations of Title 18, United States Code, Section 1591(a). There is also probable cause to believe that the location information described in Attachment B will constitute evidence of these criminal violations of 18 U.S.C. § 1591(a), and will assist case agents in determining/identifying Darren Hatchett's other victims, routines, locations of prostitution activities, and co-conspirators.

### **III. PROBABLE CAUSE**

#### **A. Initial Report by Pewaukee Police Department**

9. In July 2018, I became a case agent on an investigation concerning Darren D. Hatchett (DOB 07/XX/1985) when I was contacted by Pewaukee Police Department regarding the following information.

10. Pewaukee Police Sgt. Wright indicated that on July 14, 2018, his agency had contact with an adult victim (hereinafter AV-1) (DOB XX/XX/1997) and her family. At the time of the contact, information was provided to the Pewaukee Police by AV-1's family that she was a victim of Human Trafficking and the family was attempting an intervention with AV-1. AV-1 attempted to evade her family's attempt and the Pewaukee Police Department was called.

11. Pewaukee Police Department officers made contact with AV-1 and her family. Officers described AV-1 as emaciated and having narcotic withdrawal symptoms. They determined that AV-1 had outstanding warrants and she was taken into custody. AV-1's family reported that Darren D. Hatchett (DOB 7/XX/1985) with an address of 3411 W. Clybourn Street

in Milwaukee and a phone number 414-406-7364 (hereinafter, Hatchett's Phone Number) was soliciting AV-1 for prostitution. AV-1's mother reported that AV-1 was a victim of a Human Trafficking ring in Milwaukee and AV-1 has contacted her family members several times to help her get out of the situation. AV-1's mother also told Pewaukee Police Department that AV-1's boyfriend, Darren Hatchett, was very abusive and possessive. AV-1's mother also told officers that AV-1 had a drug addiction. AV-1's mother also advised Pewaukee Police Department there were other possible female victims who were at Darren Hatchett's residence.

12. During AV-1's contact with Pewaukee Police Department, she disclosed that she resided with a group of girls. AV-1 commented about "she was just happy to be away from the house and out of the situation." AV-1 also told officers that she had not eaten for several days.

**B. Interview with AV-1's Mother on July 20, 2018**

13. On July 20, 2018, a Federal Bureau of Investigation Special Agent interviewed AV-1's mother. AV-1's mother said AV-1 contacted her on July 13, 2018, from AV-1's phone number of 757-816-XXXX. AV-1's mother said the text message read "I need you right now, can you come get me?" AV-1's mother said she then arranged for her other daughter to pick up AV-1. AV-1's mother said her other daughter picked AV-1 up from Hatchett's residence at 3411 W. Clybourn Street, Milwaukee.

14. AV-1's mother said she learned of Hatchett's phone number from AV-1. AV-1's mother was familiar with Hatchett's address because she has dropped items off for AV-1 at that residence in the past. AV-1's mother indicated that AV-1 has resided with Hatchett for approximately a year and a half. AV-1's mother has never met Hatchett in person.

15. AV-1's mother said based on AV-1's statements made to her, there were multiple females who reside with Hatchett and conduct prostitution activities for Hatchett. AV-1's



mother said she knew of another female who AV-1 was frequently with who will be further referred to as AV-2 (DOB 1/XX/1991). AV-1's mother provided a phone number for AV-2 as 414-722-XXXX. AV-1's mother indicated that AV-2 has child(ren) with Hatchett but she recently left Hatchett and returned to Indiana.

16. AV-1's mother said she knew AV-1 travelled to various states including Texas and New York to engage in prostitution activities. AV-1's mother said AV-1 was arrested in Texas after she was attacked and robbed by a prostitution customer at a hotel and was found to have controlled substances on her. AV-1's mother described a second incident when AV-1 traveled to New York and AV-1 called upon her mother for assistance in returning home because she did not have money. AV-1's mother suspected AV-1 needed assistance because Backpage.com, a prostitution based website, was shut down prior to AV-1 calling her.

17. AV-1's mother believed AV-1 was scared of Hatchett as he was controlling. AV-1's mother recalled overhearing a telephone conversation between AV-1 and a male subject who AV-1's mother believed to be Hatchett. At the time, AV-1 was visiting her mother. AV-1 hid in a closet to make a phone call and was asking the male subject for permission for AV-1 to stay longer for her visit. AV-1's mother overheard a male voice yelling at AV-1 and AV-1 was picked up shortly after.

18. AV-1's mother also reported Hatchett was in control of AV-1's Facebook and Instagram accounts as there have been changes made to AV-1's account since she has been in custody. AV-1 told AV-1's mother that Hatchett accessed her Facebook account. AV-1's mother believed that Hatchett used AV-1's Facebook page to communicate with other females as AV-1's mother was not aware of Hatchett having his own Facebook account.

19. AV-1's mother indicated that she was in possession of two cell phones belonging to AV-1. AV-1's mother indicated that the cell phones were turned over to her when AV-1 was taken into custody by Pewaukee Police Department. AV-1 was not sure of the phone numbers for the phones.

**C. Recovery of AV-1's Cell Phones**

20. On August 2, 2018, Special Agent Melissa Fus obtained the two cell phones from AV-1's mother. The cell phones were described as: white/silver Apple Iphone, Model A1453, with cracked screen; IMEI: 352029067026487; FCC ID: BCG-E2642A; IC: 579C-E2642A; and a pink/white Apple Iphone with multicolored cover, Model A1784, FCC ID: BCG-E3092A; IC: 579C-E3092A.

21. On September 20, 2018, a search warrant for the phones was approved by the Honorable Milwaukee County Circuit Court Commissioner J.C. Moore and are the subject of a forensic examination.

**D. Interview with AV-1 on July 23, 2018**

22. On July 23, 2018, WI DOJ-DCI Special Agents Melissa Fus and Raymond Taylor interviewed AV-1. AV-1 was hesitant to speak with law enforcement. AV-1 said she was in a fight and got a black eye from one of her roommates (girl) at a residence in Milwaukee and she called her sister to come pick her up. AV-1 declined to provide the address of where she was picked up and also declined to provide information about with whom she was in the fight. After her sister picked her up in Milwaukee, they went to Pewaukee to her sister's residence. AV-1 said she went for a walk and when she was walking on the sidewalk Pewaukee Police made contact with her. AV-1 declined to provide any additional information or to continue to talk with law enforcement.

**E. Interview with AV-1's sister on August 21, 2018**

23. On August 21, 2018, WI DOJ-DCI Special Agents Melissa Fus and Raymond Taylor interviewed AV-1's sister who said that on July 13, 2018, AV-1 contacted her by phone. AV-1 called her from phone number 757-816-XXXX. AV-1 sounded distressed and she urgently needed a ride from a residence in Milwaukee. AV-1's sister said there were several additional calls from AV-1 until AV-1's sister finally responded to Milwaukee to pick up AV-1 at approximately 6:53 p.m., which was 1½ hours after she received the first call from AV-1. AV-1's sister said AV-1 called her multiple times and would say she no longer needed a ride and then she would call back and indicate that she needed a ride. AV-1's sister said she actually was in her vehicle two times getting ready to pick up AV-1 prior to actually driving to Milwaukee because AV-1 would cancel her request for a ride. AV-1 then contacted AV-1's sister and told her that she had a small window when she could be picked up and that it needed to be around 5:30 p.m.

24. AV-1's sister said she and her fiancé drove to the residence located at 3411 W. Clybourn Avenue, Milwaukee, WI. AV-1's sister knew the address of the residence where AV-1 was staying because she had picked up AV-1 from the residence before. AV-1's sister said upon arriving at the residence, she pulled in front of the residence and immediately exited her vehicle. AV-1's sister said she heard AV-1 yelling for help so AV-1's sister ran to the porch of the residence. AV-1's sister said she observed several females grabbing AV-1 by her arms attempting to keep AV-1 from leaving the residence. AV-1's sister said she observed some of AV-1's belongings on the porch area. AV-1's sister said she started to pull on AV-1's arms and clothing and attempted to pull AV-1 back outside of the residence. AV-1's sister said her fiancé also blocked the females from closing the door and helped with getting AV-1 out of the



residence. AV-1's sister said the females were yelling at AV-1 to stay. After approximately a few minutes of struggling over AV-1, they grabbed AV-1's belongings on the porch and ran to the vehicle and left the residence.

25. AV-1's sister said after they left Hatchett's residence, AV-1 expressed concern for her safety and the safety of her family. AV-1's sister provided an example of AV-1's frantic mental state when AV-1 told her sister to go through a red traffic light for the fear of running into Hatchett. AV-1's sister said AV-1 observed a vehicle that was similar to the vehicle driven by Hatchett, which was a blue Audi, and she panicked. AV-1's sister said she told AV-1 to turn off her cell phones because she knew that Hatchett had access to AV-1's phone.

26. AV-1's sister reported that on the way home, she received a phone call from an "Unknown Caller." AV-1's sister said she answered her phone and spoke with an older male subject. The male subject did not provide his name, but based on the context, she knew it was Hatchett. The male subject asked to speak with AV-1 and she denied his request. The male subject asked AV-1 why they were there at his residence in Milwaukee and asked where they were now. The male subject then made a point to mention AV-1's sister's fiancé by name as well as their dog's name. The male subject then mentioned another family member by name. AV-1's sister said the male subject did not overtly threaten anyone, but she knew that he was attempting to indirectly threaten and/or intimidate them. After ending the phone call, AV-1's sister said she received approximately three to four additional calls from an "unknown caller" but she did not answer.

27. Once they arrived at AV-1's sister's residence, AV-1's sister talked to AV-1. AV-1's sister asked AV-1 why the other females at the residence were attempting to prevent AV-1 from leaving the residence and AV-1 said the "other girls" were not fortunate to have

family to help them and that lifestyle was the only lifestyle they knew. AV-1 further told her sister that most of the girls were addicted to Percocet pills and AV-1 told her sister that she would get sick if she stayed by her sister's house. AV-1's sister assumed that AV-1 would get sick because AV-1 was also using some sort of controlled substance. AV-1 made other comments to her sister as follows: she could no longer live like that and keep allowing stuff to happen; she would rather be dead than go through this; nobody should have to go through this; and they just pass you around and they all got a piece.

28. AV-1's sister reported that when she picked AV-1 up from Hatchett's residence, she noticed several injuries to AV-1's body. AV-1's sister said AV-1 had bruises on her arms, legs, and stomach. A-1's sister stated the bruises on her arms appeared to be caused from fingertips/grip. AV-1's sister also observed that AV-1 had a bruised/black left eye and also injuries to her foot where her toe and ankle were discolored. AV-1 told her sister that she was pushed down the stairs. AV-1's sister described AV-1 as skinny, malnourished/looked ill, and possibly using drugs.

29. AV-1's sister knew that in the past if AV-1 would leave Hatchett's residence, AV-1 would go back to Hatchett out of fear. AV-1's sister feared that if she went back to Hatchett this time that she would never see AV-1 again. AV-1's sister said she convinced AV-1 to turn her phones over to her sister. AV-1's sister then monitored who AV-1 was talking to while using AV-1's sister's cell phone. AV-1 said on July 14, 2018, AV-1 was supposedly talking to their mother on her sister's phone and walking around outside. AV-1's sister observed AV-1 obtain her bags and then leave the residence on foot. AV-1's sister said she ran after AV-1 and other family members called the police and AV-1 was eventually taken into custody. AV-

1's sister said she looked at her cell phone and noticed that AV-1 called the Hatchett's phone number at 10:36 a.m. and 10:51 a.m.

30. AV-1's sister said she knew that AV-1 was involved in prostitution activities for approximately the last two years. AV-1's sister observed ads on Backpage.com that depicted AV-1 and AV-1 identified herself as "Grace" in the ads. AV-1's sister knew that AV-1 traveled to Texas and Florida in the past for prostitution. AV-1's sister recalled AV-1 telling her that another female at Hatchett's residence would purchase her a plane ticket and the she would be "shipped out." AV-1's sister said she asked AV-1 how much money she would give to Hatchett and AV-1 would not answer.

31. AV-1's sister indicated that AV-1 expressed concern for her family's safety. AV-1 also told her sister that Hatchett had several firearms in the residence. AV-1's sister said Hatchett was very controlling and he was in control of AV-1's Facebook and Instagram accounts.

32. AV-1's sister provided law enforcement with a copy of text messages and injury photos of AV-1. The screenshots of text messages with AV-1 started at 5:26 p.m. on July 13, 2018. The text messages were consistent with AV-1's sister's statement regarding AV-1 contacting her for a ride. At 6:22 p.m., AV-1 told her sister to wait 30 minutes. At 6:33 p.m., AV-1 told her sister that she needed to get there now. At 6:48 p.m., AV-1 texted "im freaking the fuck out [sister's name] hurry now before something happens." The photos showed feet with white painted toenails and several bruises and injuries that had scabbed over. There was also a facial image of AV-1 with some discoloration below her left eye.

#### **F. Record Checks**

33. Your Affiant conducted record checks for AV-1, AV-2, and Hatchett. Special Agent Fus learned that Hatchett has been arrested for offenses including use of a dangerous weapon and felony murder. Hatchett also has an open and active warrant for his arrest with the New Mexico State Police for a driving offense. Hatchett's current address listed on his WI driver's license was 3411 W. Clybourn Avenue, Milwaukee, WI. Hatchett had a previous address listed as 337 W. Hadley Ave, Milwaukee.

34. The records check for AV-2 revealed a report with the Milwaukee County Child Protective Services ("CPS") from April 17, 2017. The anonymous caller reported that the child of AV-1 was being exposed to harmful conditions at the residence of 3411 W. Clybourn Street, Milwaukee. The harmful conditions mentioned included: drugs, prostitution, and firearms. The father of AV-1's child was identified in the report as Hatchett. AV-1 was also listed in the report as residing at the residence, but was a non-caregiver to AV-1's child. The anonymous report made to CPS indicated that AV-1 and AV-2 were involved in prostitution in Wisconsin, Kansas City, Texas, Virginia, and Louisiana. The reporting party indicated that April 10 through April 15, 2017, AV-2 and her child, AV-1, and Hatchett, travelled to Dallas, Texas. AV-1 and AV-2 engaged in prostitution activities while Hatchett watched AV-2's child at a different hotel room. The reporting party indicated that AV-2's child was exposed to AV-2 and AV-1 making arrangements for prostitution dates on the phone. The reporting party also identified Hatchett as AV-1 and AV-2's pimp and stated that Hatchett was violent towards AV-2 and broke her jaw approximately 1 ½ years ago.

35. As a result of the anonymous report to CPS, CPS made contact at the residence of 3411 W. Clybourn Street. Contact was made with AV-2, AV-1, and Hatchett. CPS indicated that AV-2 and Hatchett denied being involved in prostitution or human trafficking. Immediately

upon entering the residence, CPS noticed several firearms on the dining room table. Many of the firearms were dismantled and there were several magazine clips stacked. CPS noted that the ammunition was stored in a can.

36. AV-1's criminal history shows that she was arrested in Irving, Texas, for a drug offense. The police report associated with the arrest indicated that on May 30, 2017, Irving police officers responded to a Hotel located at 850 W. Walnut Hill, room #231, in Irving, Texas, for the report of a robbery. AV-1 called the police after she was robbed in her hotel room. AV-1 indicated that the suspect was a male subject that was coming to the hotel room to sell AV-1 marijuana, but he took AV-1's cell phone instead. AV-1 was then found to be in possession of other controlled substances. Also present as a witness/friend was AV-2. AV-2 was in a different hotel room when the incident occurred. According to the report, AV-2 was staying in room #208 and the incident occurred in AV-1's room #231. During their investigation, officers observed several items indicative of prostitution activities in both hotel rooms.

37. Your Affiant also obtained police reports from the Milwaukee Police Department for incidents involving AV-2 and Hatchett. One incident occurred on October 26, 2014, where AV-2, AV-2's daughter, a juvenile cousin of Hatchett, and another adult female named Q.M. (DOB XX/XX/1996) were shot at while seated in a parked vehicle at 3433 W. Sheridan Avenue in Milwaukee. AV-2 was struck with a bullet in her buttocks. In this report AV-2 said she was driving her boyfriend, Terrence T. Hatchett's (DOB 4/XX/1987), vehicle and had just dropped Terrence off to retrieve some other family members and was waiting in the vehicle when an occupant in a white vehicle shot at the vehicle AV-2 was driving. AV-2 indicated she did not know who shot her, but said she did not want to pursue the matter as she did not want to be viewed as a "snitch."



38. A second incident report from Milwaukee Police Department occurred on January 18th, 2018, there was a request for service call at 3411 W. Clybourn Street, Milwaukee, WI. The caller, AV-2, requested assistance with retrieving her children and property from inside of the residence. AV-2 reported on the phone to the dispatcher that she was afraid her boyfriend would hurt her. AV-2 also reported that her boyfriend has made threats to her in the past. AV-2 was on foot while she was on the phone with the dispatcher. As the dispatcher continued to ask questions, the call disconnected. Later, Milwaukee Police made contact with Darren Hatchett at the residence and the officers were advised that AV-2 and Darren Hatchett were in an argument. AV-2 left town for the night and AV-2's children were allowed to stay with Darren Hatchett.

**G. Prostitution Ads for AV-2**

39. On July 24, 2018, your Affiant conducted a search on the websites commonly used for prostitution ads. There were several ads for prostitution that were located with the phone number listed in the CPS report for AV-2, as 337-930-XXXX.

40. The photos of the female depicted in the ads were of AV-2. There were over 6,000 ads located. The most recent ad found was posted on June 8, 2018, and the first ad located was posted on July 14, 2015. There were ads posted on Backpage.com, Facebook.com, Adultsearch.com, Skipthegames.com, and Cityxguide.com. The following were some of the locations listed for the ads: Dallas, Texas; Kansas City, Missouri; Chesapeake, Virginia; Lake Charles, Louisiana; Denver, Colorado; Milwaukee, Wisconsin; Manhattan, New York; Greenville, South Carolina; and Pennsylvania.

**H. Prostitution Ads for AV-1**

41. On November 8, 2018, your Affiant conducted record checks and located several prostitution ads for AV-1. The first ad I located was on Escortdirectory.com, which depicted various photos of AV-1. The phone number listed on the ad was 469-990-XXXX.

42. Your Affiant located additional ads for AV-1 with the above-listed phone number. The following was the information obtained from the ads. There were over 643 ads located with AV-1 depicted. The earliest posting date I observed for the ad was March 1, 2017. There were ads posted on Usaadultclassifieds.com, Adultsearch.com, <https://twitter>, Cityxguide.com, Skipthegames.com, Backpage.com, and Eroticmugshots.com. The following were some of the locations listed for the ads: Milwaukee, Wisconsin; Manhattan, New York; Dallas/Fort Worth, Texas; Denver, Colorado; and Kansas City, Missouri.

#### **I. Jail Calls**

43. Your Affiant obtained jail calls from the Waukesha County Jail made by AV-1 while AV-1 was incarcerated. The jail calls were dated from July 14, 2018, to November 18, 2018. AV-1 made frequent outgoing phone calls to Hatchett during the above dates. During all of these calls, Hatchett was using the **Target Phone**. AV-1 frequently called Hatchett "Daddy." Based upon my training and experience, individuals who engage in human trafficking commonly require that the women who engage in prostitution activities for them call them "Daddy."

44. During the initial phone calls made to Hatchett in July 2018, AV-1 talked about how she was concerned about her phones that her mother had. Hatchett asked AV-1 for her codes and then he could "wipe" her phones right away. Hatchett also warned AV-1 that her mother could give the phones to the police. Hatchett eventually indicated the phones were set to be wiped once they were connected to WIFI. AV-1 apologized several times to Hatchett for leaving and not listening to him. AV-1 told him, "I miss you, I want some dicks to suck."

45. There were several examples of phone calls between AV-1 and Hatchett in which Hatchett was controlling, threatening, or provided statements on the prostitution activities. The following were some examples.

a. On July 21, 2018, Hatchett and AV-1 were talking about AV-1's mother and what she was saying about Hatchett. Hatchett told AV-1 that there was nothing that her mom could do and if her mom did do something that that was going to get AV-1 into more "bullshit." Hatchett continued and told AV-1, "Whoever told her yeah you understand what goes on in this household" and "What goes on here don't go outside the house and I don't give a fuck if your ass is on fire" and "I don't care if you see your motherfucking parent kill a motherfucker you understand me it stays in this household." Based on the context of this conversation, and my training and experience, I believe that Hatchett was providing an example of his growing up and how important it was to keep and maintain secrecy of events that take place in a household. Hatchett did not threaten AV-1 but the conversation demonstrated that Hatchett had control over AV-1 and wanted was trying to prevent AV-1 from talking to her mother about her and Hatchett's relationship.

b. On July 24, 2018, Hatchett told AV-1 that he was "irritated at motherfuckers you already know these hoes ain't doing shit you know what I'm saying. They just sit around." Later in the evening on July 24, 2018, Hatchett was crying because the mother of his child left his residence with the child. AV-1 asked if Hatchett had her location. Hatchett said he did but she turned it off. AV-1 said her phone must be off then and Hatchett told AV-1 that he knew her phone was not off and that he planned to call Sprint to look up the exact location. The female who left the residence was later identified to be an adult victim referred to as AV-5 (DOB 3/XX/1990).

c. On July 28, 2018, AV-1 called Hatchett. Hatchett asked, "You sure your mama can't get into your phone?" AV-1 replied, "No, she can't. Why?" Hatchett responded, "Cause the one motherfucker said she been texting and some shit and some motherfucker been from your phone and shit." Hatchett asked if you need a code for her "trap" phone and AV-1 said yes. AV-1 told Hatchett that she did not give her (referring to her mother) "codes or none of that shit." Hatchett then said, "In the morning, when you call back, I'm going to need you to give me all your codes and shit." Based on my training and experience, a "trap" phone is a cell that is used for illegal activity to include prostitution. Hatchett was concerned that AV-1's mother would have access to her phone as Hatchett believed a message was sent from AV-1's "trap" phone to another person (believed to be another female at the residence) since AV-1 has been in custody.

d. On August 10th, 2018, Hatchett told AV-1, "We are out of state." AV-1 then asked Hatchett, "Just you or naw?" Hatchett replied, "Hell naw [no]." AV-1 told Hatchett that she does not know what to do with her life and that she wanted to go to college, be better than people, and not be nothing her whole life. Hatchett then replied, "So what you're saying basically is you ain't trying to be with me no more." AV-1 told Hatchett that she no longer wanted to live in Milwaukee. AV-1 then asked Hatchett, "What is it you got three bitches?"

Darren Hatchett replied, "Yeah." Hatchett said, "I drove all the way here. . . 17 of them." AV-1 asked, "Hours?" Hatchett said, "Hell, yeah." Based upon my training and experience and investigation in this case, I believe that Hatchett was approximately 17 hours from Wisconsin with three of his victims engaging in prostitution activities.

e. On August 16, 2018, AV-1 called Hatchett. Hatchett said, "Motherfucker playing with me so I gotta do what I gotta do." AV-1 asked who and Hatchett said AV-1 knew who he was talking about. AV-1 said, "Them bitches or what? What's going on?" Hatchett replied, "The last motherfucker who played me. Or they pulled some bullshit." AV-1 asked who it was and Hatchett said it does not matter and "I don't really feel like talking that's why I ain't picking up the fucking phone. I ain't got shit to talk about." Hatchett said "I've been dodging this shit the whole time trying to stay away from this shit. I just gotta do what I gotta do. You understand what I'm saying? I'm a young black man, I was made for that type of shit, you know what I'm sayin. There ain't no way in hell that I was even supposed to be out here this long doing this shit for 35, 34 motherfucking, 33 motherfucking years doing this shit no. I'm just going to turn myself in do what the fuck I supposed to do my nigger for real cuz ain't no motherfucker going to play me, regardless, I don't care. It don't matter where you are broad daylight I'm going to take your soul. You understand me? So it's all good." AV-1 again asked, "Who?" Hatchett said, "You know. Whoever's been playing me. Who was playing me? . . . My fucking baby mama! Who the fuck else man?" Hatchett said, "I'll see you when I get there." AV-1 asked why he said that and Hatchett replied, "I'm telling you. It ain't no if's and's or but's about it bro." AV-1 told Hatchett that it was not worth it and Hatchett told her that it was. Hatchett told AV-1, "I'ma show you." AV-1 again told Hatchett, "It's not worth it." Hatchett replied, "Sure. You can tell me. I live by this shit I'ma die by this shit. I ain't worried about it. . . [unintelligible] damn nigger out here like literally I ain't she did did did did me like man so bad it's so bad like. The stress is real." Hatchett said, "I'ma be smart about the situation because you know what I'm talking about [unintelligible]. But I'm telling you right now it ain't no if's and's or but's about it. I know. You know what I'm saying? . . . There's nothing they can do. I said they gotta go fed on me. Ain't nothing they gonna do. They gotta come full force, they ain't gonna have to call the police". AV-1 asked who and Hatchett said, "Motherfuckers can't do nothing. I am going to have my way." At the beginning of the conversation, Hatchett was talking about how he was going to see AV-1 in jail because of something that he was going to do to his "baby mama." Initially AV-1 sounded distressed because AV-1 believed that Hatchett was talking about her and then Hatchett eventually clarified that he was upset with his "baby mama." This demonstrates the fear and control that Hatchett had over AV-1 even though Hatchett was not targeting harm towards AV-1. Based on the context of this conversation, Hatchett was planning to take harmful action the mother of one his children and his statements reflect that the harm he intended was serious enough that law enforcement would get involved.

f. On September 26, 2018, Hatchett told AV-1 that he did not expect AV-1 to come home to him because her mother "got a hold of you". AV-1 told Hatchett "don't say shit you don't mean" and "if you cared about a motherfucker, if you loved a motherfucker like you say you do you ain't, you'd just be cool." Hatchett told AV-1 that his "baby mama" would say the same thing. Hatchett further said, "Bitch, I don't give a fuck if I love you, if you ain't fucking with me right now, I don't give a fuck if you was my wife [unintelligible] if you ain't in my motherfucking corner, you can get the fuck out my motherfucking way. I don't give a fuck who



you is period. I'll roll over your bitch ass and shoot at you. I don't give a fuck about that shit. The fuck you think this is." Hatchett continued and said, "if you not in my corner then you on the wrong side of the motherfucking fence." The conversation then continued by Hatchett asking AV-1 if her mother asked about "Milwaukee shit" and AV-1 replied, "No." Hatchett further commented to AV-1 that when she was released from jail that she was going to be "a whole 'nother motherfucker because they in there listening to that old motherfucking jailbird ass motherfucking shit. That's how that shit goes. I don't give a fuck who you is. You could be the strongest motherfucker when you get out of there. For one you're sober. For two, you been around all squares and then you got your square ass motherfucking mama." Based on my training and experience Hatchett and AV-1 talked about whether she would return to his residence or not when she was released. Based on AV-1's comments, she was hopeful that if Hatchett "loved her" like he said he did then he would let her be once she was released from jail. The conversation demonstrated the control and isolation that AV-1 was subjected to while being with Hatchett and also using controlled substances. Hatchett also re-iterated that fact of what he would do to (threats) someone if they were not with him.

g. On October 4, 2018, AV-1 talked with Hatchett. Hatchett expressed that he was very displeased with AV-1's mother. Hatchett and AV-1 were discussing the circumstances of AV-1 running through the yards in Pewaukee when she was arrested. Hatchett commented, "Your mama dead bitch, okay" and "trash" and "I'd push her down a flight of stairs." Hatchett further said, "Tell the bitch she owe me. You know what I'm talking about? For putting my name in her mouth." Based on several jail calls, Hatchett expressed and threatened harm to AV-1's mother because of how AV-1 was arrested by the Pewaukee Police Department.

h. On October 22, 2018, AV-1 called Hatchett. Hatchett told AV-1, "They make a motherfucker kill themselves and the motherfuckers they talking bad about me man and I don't like that shit you know what I'm saying. When a motherfucker talk bad about me and I help the motherfucker man you ain't gotta do no shit like that." AV-1 asked who was talking shit and Hatchett replied, "All the motherfuckers who I help." Hatchett mentioned, "The only motherfucker I ever helped. The only motherfucker I tried to help." Hatchett told AV-1 that when he gets into it with someone, "It ain't over until the fat lady sings. I'm going to meticulously kill your ass." It was believed that Hatchett was disgruntled with a male acquaintance of his. During the conversation Hatchett then mentioned the name "Andrea" as well. AV-1 did not recognize her name and Hatchett said she was "that bitch who's car we used to be driving." AV-1 asked, "The little bitch with the red car? Or the little truck kind of thing, yeah, that not legal ass bitch?" Hatchett then started yelling at AV-1, "I don't know nothing about that shit you talking about whore! For some reason that decided to come out your mouth at this time right now, whore! Cause you's a fucking fag, bitch." Hatchett continued to yell at AV-1 because she made that comment and said "Why did you decide to say that shit? You fucking faggot ass hoe" and "Faggot ass bitch why you got some stupid ass shit you know they can get you in there and say anything and you twist your brains and you gone get to talking so please, please don't incriminate me motherfucker." AV-1 then asked why he was still yelling and Hatchett replied, "You don't think unless I tell you to think bitch and you don't motherfucking say no shit unless I tell you to say it dumbass." AV-1 then replied, "I don't fucking take orders, but alright." Hatchett then yelled, "Alright, so what the fuck you on my line for then? Nothing?" Hatchett said, "You would put me in jail for ten years." AV-1 said, "Who's



breaking down? Because I sure the fuck ain't. I wish the fuck I would over some dumb ass shit." Hatchett then changed the topic and said, "I'm about to go take this nigger's bitch." AV-1 said, "Oh, that's cool. Get it done. Who? Motherfucking Andrea?" Darren Hatchett replied, "Katelyn." AV-1 asked, "Katelyn?" Hatchett replied, "Yeah, that's her name." AV-1 then told Hatchett that she did not know who that was and Hatchett told AV-1 that "she was at the house for a while you do remember." AV-1 told Hatchett that she did not remember. Later in the evening, AV-1 called Hatchett again. Hatchett and AV-1 discussed how the weather was warm where he was at. Hatchett also talked about how he has his daughter with him so she is getting some good food and treated well. AV-1 told Hatchett that she was only five years old and that she was not going to remember the trip. Based on my training and experience, Hatchett was upset with AV-1 for making possibly incriminating statements about an underage female that they were associated with. It was also evident that Hatchett was attempting to recruit another female for prostitution activities. During this call, Hatchett again demonstrated his anger, verbal abuse, and control over his victims with the comments when he was yelling at AV-1. Hatchett was believed to have his five year-old child with him while he traveled out-of-state with other females to engage in prostitution activities.

i. On October 31, 2018, AV-1 called Hatchett. Hatchett asked, "What the fuck your mama on? She out reaching out to my kids and shit man, writing my kids all types of reckless ass shit on Facebook." AV-1 asked what Hatchett was talking about and Hatchett said, "Your mother, the Caucasian whore. Oh damn, she ain't even Caucasian. She on your Facebook." AV-1 was confused and Hatchett started to get upset with AV-1 and said, "The bitch got on your shit and typing all type of shit". The call was then disconnected. In a later call, Hatchett told AV-1 that her mother messaged Amir (Hatchett's son). Hatchett said she messaged Amir that his dad was "the devil." Hatchett expressed anger because AV-1 could not "control" her mom and that she was trying "to expose" him "to Amir." Hatchett asked AV-1, "You know how many reckless ass messages on there?" Hatchett asked AV-1 "Why she even on your Facebook? You the one that gave her your codes and you talking about 'No, you didn't.' Yes, you did." AV-1 said her mom was mad because "I don't talk to her like that" and that she was trying to control AV-1 again. Hatchett said, "I see what she trying to do. She trying to make me mad at you so then I don't . . ." AV-1 said "probably and look that shit worked." Hatchett mentioned "my people just told me on that you think [AV-1's] mama might be trying to do that you know to make me angry." Hatchett further said, "She say all type of police ass shit too." Hatchett said, "Motherfucker [AV-1's mother] like if you fuck with my daughter you going to jail." Hatchett continued and said that his "baby mamas" were asking him why he was still "going to fuck with this little thing [AV-1] if her mama telling you she gonna call the law." Hatchett said, "Motherfucker hitting me up on garbage." Hatchett said, "I can get on Jordan's Facebook or Lily's Facebook." Darren Hatchett said, "You know how many reckless ass messages are on that." Hatchett said "Motherfuckers got one time to play police shit with me you understand me and then I'm going to take this motherfucking ass." Based upon my training and experience, I believe this phone call indicates that Hatchett was concerned about AV-1's mother and how she posted messages on his son's Facebook page. Hatchett used two other female victim's Facebook pages to look at the messages on his son's Facebook page. Hatchett maintained control over AV-1 by his indirect threats to AV-1's mother and was also upset with AV-1 for giving her Facebook passwords to her mother.

46. When AV-1 talked to Hatchett on the jail phone, she would occasionally talk to other females who were with Darren Hatchett. Based upon the nature of those conversations and my training and experience, I believe that these females were residing with Hatchett and also involved in prostitution activities. Hatchett provided a phone number to AV-1 for one of the females as 414-349-XXXX.

47. Hatchett and AV-1 had frequent conversations about his firearms and his trips to the firearm range. On July 22, 2018, Hatchett was "doing his thing at range." AV-1 asked him, "They all went?" Hatchett replied, "I ain't taking no bitch . . . you gotta watch these bitches they starting to turn in."

48. AV-1 confided in some of her other friends who she talked with on the jail phone. AV-1 made several comments to a male friend who she had frequent contact with about how she was scared of Hatchett. Based upon my review of these conversations, I believe that AV-1 is maintaining contact with Hatchett so Hatchett will let her leave and so Hatchett does not feel like she would betray him.

j. On September 16, 2018, AV-1 told one of her male friends that she was tired of giving money away and "you know what I'm really scared of is if I don't fuck with this motherfucker anymore and I be out in Milwaukee I swear to God if I ever see him he gonna fucking kill me on my life." AV-1's friend asked why and AV-1 replied, "I don't know he just that type of motherfucker like I could just. . .he never says it like that but I could just see it you know? He be like, he would be like 'oh you betrayed me' and all type of shit." Later in the evening, AV-1 told her friend, "I felt so bad man, motherfucker made me block everybody . . . I swear to God if a motherfucker looked at my phone and seen like I you know how many times I got my ass beat for Ty just like trying to message me and shit I swear to god like mm mm." AV-1 said, "It was fucked up . . . I can't wait to live my life again just like be free it's like a relief."

k. On September 17, 2018, AV-1 commented to the same male friend, "It's just it was fucked up like I can't go back to that shit I can't go back to him no more."

l. On October 7, 2018, AV-1 confided in her male friend to change her Facebook and email account passwords so Hatchett would no longer have access to them. Also, AV-1 commented to her friend, "See what kind of money I can really get doing shit the right way." The male friend told AV-1 that at least it was "honest money" and that nobody can regulate that

money. AV-1 said, "I won't have to give a dollar to a motherfucker that don't deserve it...that shit pissed me off. I wasted so much money on a motherfucker just taking that shit. Doing the wrong shit with the money too." AV-1 talked about Hatchett and said, "I'm scared though like motherfucker gonna come after me type shit like I do not want that shit to happen. . . he the kind of motherfucker that gonna want blood if I fuck him over. . . he's scary that's for damn sure. He got plenty heat. He got so many heats. I ain't trying to fuck around with that."

m. On October 18, 2018, AV-1 called a male friend. AV-1 told him, "This motherfucker scary, too, man. I'm scared. I'm scared he gonna come after me or some shit like. I gotta worry about that. I always gotta look behind my fucking back now everywhere I go especially if I go to the Mil (Milwaukee). That's the scariest part. I don't want a motherfucker to...if that motherfucker ever see me on the street ooh it's war. I already know that shit." The male subject asked why and AV-1 said, "I don't know cause he gon he feel like cause I'm still pretending that I fuck with him so he don't, he don't understand that I'm just going to dip out on his ass but. . . I'm scared cause I don't want him to I don't know try and do some shit against me like some fuck shit you know. It's harder to do it while I'm in jail than when I get out you know. Cause there's shit I can't say over these phones you know like some real shit I wanna tell him really what the fuck it is. Like I'm not about that life no more. None of that shit . . . he like he says the same shit Max said to me. I made you and all this shit and you gonna betray me and you gonna fuck with somebody else and do the same shit." AV-1 said, "Motherfucker is crazy in the head . . . [a] controlling freak." AV-1 said she does not even want to talk to "him" anymore.

n. On November 1, 2018, AV-1 called a female friend. AV-1 complained about her mother communicating on her Facebook page. AV-1 told the female, "This dude that I used to like mess around with and shit she didn't like him and everything and she went and messaged his kids like talking all type of crazy shit dude. She's trying to get me hurt."

49. AV-1 would also frequently ask her mother on jail calls to stop talking about "her situation," including to the police. AV-1 expressed to her mother that she was making matters worse for her. In one call, AV-1's mother was talking to AV-1 about the abuse and sex trafficking and AV-1 told her mother, "Just please stop before you get myself hurt. Or else like..."

50. During some of the jail calls, Hatchett told AV-1 that he was out-of-state. For example, on November 11, 2018, Hatchett told AV-1 that he just left California and was headed to Denver. Hatchett also told AV-1 that he had been out of town for almost one month, since the day after he visited AV-1 in jail. According to AV-1's visitor log, Hatchett visited AV-1 at the Waukesha County Jail on September 18, 2018. On November 18, 2018, AV-1 asked Hatchett

“You back?” and Hatchett replied, “Hell no.” Hatchett said he left one light on in the house (the one when you “first walk in”) so it didn’t “look dead in that motherfucker.”

**J. Interviews with AV-1’s friends**

51. Case agents conducted interviews with three of AV-1’s adult friends who were not involved in prostitution. The friends will be further referred to as Citizen Witnesses (CW) #1, #2, and #3.

52. On November 9, 2018, agents interviewed CW-1. CW-1 said she knew AV-1 was involved with having sex for money and has been for at least the last year. CW-1 knew that AV-1 would perform sex acts and then give her money to the male subject with whom she resided. CW-1 said AV-1 told her in the past that there were other girls who resided in the same residence with AV-1 and the male subject. CW-1 also recalled AV-1 telling her that all of the girls would have sex with the male subject at the same time and the other girls also conducted sex acts for money. CW-1 also knew that the male subject provided AV-1 and the other girls with marijuana and ecstasy pills. CW-1 said AV-1 told her that she would take an ecstasy pill before she would perform a sex act.

53. CW-1 indicated that she saw AV-1 depicted in prostitution ads on Backpage.com. CW-1 provided investigators with a screenshot of an ad observed from March 2017. The phone number listed on the ad was 469-990-XXXX. CW-1 said that she observed a video of AV-1 that AV-1 posted on her Instagram page where AV-1 had bruises on her legs. CW-1 provided a copy of the video to investigators.

54. CW-1 indicated that AV-1 contacted her in October 2017, and asked CW-1 to pick her up from the male subject’s residence, but AV-1 later changed her mind because she was scared to leave. CW-1 said she never met the male subject in person and only knew that AV-1

resided with him in the area of W. Clybourn Street in Milwaukee, which would be consistent with Hatchett's residence at 3411 W. Clybourn Street in Milwaukee.

55. On November 9, 2018, agents interviewed CW-2. CW-2 indicated that in April 2018, AV-1 asked CW-2 to come work with her and make money. CW-2 knew this meant engaging in prostitution activities because of previous conversations with AV-1. CW-2 said she would frequently observe images that AV-1 posted on her social media accounts. CW-2 said AV-1 was frequently with two other females who CS-2 believed also engaged in prostitution activities. CW-2 provided investigators with social media accounts for the other two females. The other females will be further referred to as AV-3 (DOB 3/XX/1999) and AV-4 (DOB 8/XX/1997).

56. CW-2 said in May 2017, she had to pick up a computer from AV-1. CW-2 reviewed her phone messages and observed a message from AV-1 on May 18, 2017, where AV-1 provided the address as 3415 W. Clybourn Street, Milwaukee, WI. CW-2 said she met AV-1 down the street from the residence to retrieve the computer, so she was not sure which exact residence AV-1 stayed at.

57. On November 16, 2018, agents interviewed CW-3. CW-3 was aware that AV-1 was involved in prostitution/human trafficking and observed ads which depicted AV-1 on Backpage.com. CW-3 indicated that AV-1 was always with a female in her images that she would post on her social media accounts. CW-3 provided investigators with social media accounts for the female, which depicted AV-2. CW-3 said AV-1 would frequently post pictures of drugs, money, and herself provocatively dressed.

**K. Trash Pull at 3411 W. Clybourn Street in Milwaukee**



58. On August 31, 2018, law enforcement collected garbage/refuse from the rear alley area of the address 3411 W. Clybourn Street, Milwaukee, WI.

59. Some of the items worth noting that were collected were the following: Magpul empty packaging for MOE Polymer Rail, 5 Slots for a firearm; empty Magpul box/packaging for MOE Rail grip with for a firearm; two used firearm Bullseye Paper Targets with holes; and torn photos.

60. After reviewing the torn photos, your Affiant noted that there appeared to be two different females primarily depicted in the photos. The females were believed to be AV-3 and AV-4.

**L. Administrative Subpoena for 414-349-XXXX**

61. On November 14, 2018, your Affiant obtained subscriber information from Sprint for telephone number 414-349-XXXX, a phone number that Hatchett provided to AV-1 and which was believed to be another victim's phone number. The subscriber for telephone number 414-349-XXXX is AV-3, and Sprint provided an alternate phone number as 720-601-XXXX.

**M. Prostitution Ads for AV-3**

62. Your Affiant conducted a check for prostitution ads for AV-3 and several ads were located. The ads depicted various nude and semi-nude photos of AV-3. The ads were dated from August 11, 2018, to October 4, 2018. The locations were Milwaukee and Virginia Beach, VA. The ads were posted on Skipthegames.com and Switter. One of the phone numbers listed on the ad was 720-601-XXXX.

63. After obtaining additional phone numbers for AV-3, additional record checks were completed and several more ads were located. Some of the locations for the ads included: Milwaukee; Chicago; Manhattan; and Chesapeake, VA. The dates of the ads were from April

30, 2018, to November 10, 2018. Some of the ad platforms used were the following: adultsearch.com; cityxguide.com; and usaadultclassifieds.com.

**N. Prostitution Ads for AV-4**

64. Your Affiant conducted record checks for prostitution ads for AV-4. There were several hundred ads located for AV-4 and three different phone numbers listed. Some of the locations were: Brooklyn, New York; Chesapeake, VA; Manhattan; New York; Milwaukee; Denver; Los Angeles; and Kansas City, Missouri. The dates for the ads ranged from October 2017 to November 2018.

65. In reviewing the most recent ads posted for AV-4, Special Agent Melissa Fus noted that AV-4 had ads posted in Denver from November 12, 2018 to November 28, 2018 (date of records check). Before the Denver ads, the ads were posted for Los Angeles from September 29, 2018 to November 11, 2018. These ad locations were consistent with the information Hatchett told AV-1 on jail calls on November 11, 2018, about his out of state travel to Denver and California.

**O. Contact with Adult Citizen Witness #4**

66. On December 4, 2018, your Affiant made contact with the mother of AV-2, who will be further referred to as Citizen Witness #4 (CS-4). CS-4 said that AV-2 was with Hatchett for approximately 12 years. CS-4 said AV-2 recently left Hatchett and moved to an unknown location so Hatchett could not find her. CS-4 said both of AV-2's children were safe, as well. CS-4 said when AV-2 attempted to leave Hatchett in the past, Hatchett would threaten AV-2 and her children so AV-2 would constantly be fearful. CS-4 was very emotional and explained that she had been trying to get help for AV-2 for several years.

67. CS-4 knew that Hatchett was violent with AV-2 based on incidences that AV-2 disclosed to her. CS-4 cited the following examples: AV-2 was locked in a dog cage in Hatchett's residence in Milwaukee; Hatchett shot at AV-2; AV-2 jumped out of a moving vehicle to get away from Hatchett; Hatchett would beat AV-2's oldest daughter; Hatchett threatened to rape AV-2's oldest daughter and make AV-2 watch; and Hatchett choked and lifted AV-2's oldest daughter by her throat. CS-4 also recalled an incident when her daughter called the Milwaukee Police to get help to leave the residence and nothing happened.

68. CS-4 knew AV-2 was involved in human trafficking. CS-4 said AV-2 would travel all over for prostitution and Hatchett would not always travel with AV-2 but he would have other people watching AV-2. CS-4 said Hatchett also got AV-2 addicted to opiates. CS-4 said she knew there was an arsenal in the basement of Hatchett's residence in Milwaukee. CS-4 also believed Hatchett had powerful connections because CS-4 recalled that sometimes AV-2 would fly on a private jet to different cities.

**P. Contact with AV-1 on December 7, 2018**

69. On December 7, 2018, case agents met with AV-1. AV-1 expressed that she did not want to make a statement and she was trying to move on with her life. AV-1 said she did not want to talk about her situation with Hatchett "because I don't want to be a bad person and I don't want to get myself caught in the middle." AV-1 said that Hatchett already knew that "my mom pulled some bullshit."

70. Case agents asked AV-1 about the "barely legal" female named Andrea with the "little red car" that was mentioned in the jail calls. AV-1 told investigators that she did not know what Hatchett was doing and "he's not stupid like that so . . . doesn't mean she's not legal now."

**Q. AV-1's Facebook Accounts**

71. Investigators identified the Facebook page belonging to AV-1 under Facebook user name "Abby Rose" with corresponding Facebook UID 100001473429885, and website <https://facebook.com/abbey.deavers>. AV-1's sister, mother, and AV-1's friends also identified this as AV-1's Facebook page. AV-1's mother and sister indicated that Hatchett was in control of AV-1's Facebook account when she was initially incarcerated until AV-1 changed the passwords. Several pictures on the Facebook page depicted AV-1.

72. Investigators believe that Hatchett and AV-1 also communicated with other victims on Facebook as well as posting information that would be evidence of human trafficking.

#### **GENERAL KNOWLEDGE CONCERNING FACEBOOK**

73. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

74. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

75. A Facebook user can connect directly with other individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a

list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

76. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

77. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.

78. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link



to see the photo or video. For Facebook's purposes, the photos and videos associated with a user's account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

79. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

80. Facebook has a "like" feature that allows users to give positive feedback or connect to particular pages. Facebook users can "like" Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites.

81. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

82. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

83. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

84. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

85. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user’s IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

86. Social networking providers like Facebook typically retain additional information about their users’ accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider’s support services, as well as records of any actions taken by the provider or user as a result of the communications.

87. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a

Facebook user's IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to "tag" their location in posts and Facebook "friends" to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

88. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning

subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

89. I know based on my training and experience that traffickers and pimps commonly use Facebook to indicate to others their status as a pimp and to show cash, vehicles, clothing, and other material goods they have obtained, as a result of the lifestyle. They also use Facebook to communicate with and recruit victims of human trafficking.

#### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

90. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

#### **IV. CONCLUSION**

91. I submit that this Affidavit supports probable cause for a search warrant authorizing the search of the “Abby Rose” Facebook account described in Attachment A for the items of evidence described in Attachment B.

92. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

93. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

## ATTACHMENT A

### Premises to be Searched

This warrant to applies to information associated with the following Facebook user ID and stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered in Menlo Park, California:

NAME	FACEBOOK ID (UID)	FACEBOOK NAME
Adult Victim (AV-1)	100001473429885 <a href="https://facebook.com/abbey.deavers">https://facebook.com/abbey.deavers</a>	Abby Rose



## **ATTACHMENT B**

### **Items to be Seized**

#### **I. Information to be disclosed by Facebook**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc. ("Facebook"), regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- (a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- (b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File ("EXIF") data and any other metadata associated with those photos and videos;
- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user, including all Messenger activity, private messages, chat history, video and voice calling history, and pending "Friend" requests;
- (g) All "check ins" and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked;"
- (j) All information about the Facebook pages that the account is or was a "fan" of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account;
- (m) All information about the user's access and use of Facebook Marketplace;
- (n) The types of service utilized by the user;
- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (p) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

Facebook is hereby ordered to disclose the above information to the government within 14 DAYS of service of this warrant.

**B. Information to be seized by the government**

All information described above in Section A that constitutes fruits, evidence, and instrumentalities of violations of Title 18, Title 18, United States Code, Sections 1591(a), 2421(a), and 2423(a) involving AV-1, including, for the account identifiers listed on Attachment A, information pertaining to the following matters:

- (a) Messages, photographs, videos, memes, status updates, comments, or other postings or communications related to:
  - 1. Interstate travel;
  - 2. "Pimping," "hoeing," or the exchange of sex for money;
  - 3. Recruitment of victims for sex trafficking;
  - 4. Darren Hatchett;
  - 5. AV-2;
  - 6. AV-3;
  - 7. AV-4;
  - 8. AV-5; or
  - 9. Any other victim of human trafficking.
- (b) Evidence of user attribution showing who used the Facebook account at the time the things described in this warrant were created, edited, or deleted;
- (c) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner or user;
- (d) Evidence indicating the Facebook account owner or user's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).